

EXHIBIT 1

From: Kevin Polansky
Sent: Tuesday, January 14, 2020 10:41 AM
To: Matthew McCue <mmccue@massattorneys.net>
Cc: Ted Broderick <ted@broderick-law.com>; Anthony Paronich <anthony@paronichlaw.com>; Alex Washkowitz <alex@cwlawgroup.com>; Christine Kingston <christine.kingston@nelsonmullins.com>
Subject: RE: Mantha v. QuoteWizard.com, LLC, C.A. No. 1:19-cv-12235-LTS

Matthew,

You can be rest assured that all litigation holds are in place, but asking who they were sent to is in fact a discovery request.

Kevin



KEVIN POLANSKY **PARTNER**
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From: Matthew McCue <mmccue@massattorneys.net>
Sent: Tuesday, January 14, 2020 10:37 AM
To: Kevin Polansky <kevin.polansky@nelsonmullins.com>
Cc: Ted Broderick <ted@broderick-law.com>; Anthony Paronich <anthony@paronichlaw.com>; Alex Washkowitz <alex@cwlawgroup.com>; Christine Kingston <christine.kingston@nelsonmullins.com>
Subject: RE: Mantha v. QuoteWizard.com, LLC, C.A. No. 1:19-cv-12235-LTS

Kevin: The duty to preserve evidence is not a "discovery request." I will take your response as a declination and will send a preservation letter to Bandwidth.

Matthew

From: Kevin Polansky <kevin.polansky@nelsonmullins.com>
Sent: Tuesday, January 14, 2020 10:27 AM
To: Matthew McCue <mmccue@massattorneys.net>
Cc: Ted Broderick <ted@broderick-law.com>; Anthony Paronich <anthony@paronichlaw.com>; Alex Washkowitz <alex@cwlawgroup.com>; Christine Kingston <christine.kingston@nelsonmullins.com>
Subject: RE: Mantha v. QuoteWizard.com, LLC, C.A. No. 1:19-cv-12235-LTS

Matthew,

Thanks for letting us know your position on the consent issue. I'm sure that will be an issue the court will be interested in. As for your discovery requests, they are premature and we'll address them, if necessary, at the appropriate time.

Kevin



KEVIN POLANSKY **PARTNER**

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From: Matthew McCue <mmccue@massattorneys.net>

Sent: Monday, January 13, 2020 3:15 PM

To: Kevin Polansky <kevin.polansky@nelsonmullins.com>

Cc: Ted Broderick <ted@broderick-law.com>; Anthony Paronich <anthony@paronichlaw.com>; Alex Washkowitz <alex@cwlawgroup.com>

Subject: Mantha v. QuoteWizard.com, LLC, C.A. No. 1:19-cv-12235-LTS

Counsel: We are in receipt of your Rule 11 threat. We look forward to discussing the issue with the Court, if you are so inclined. Our position from the outset is that the client did not consent- and any claim he did so is a fraud. We will not dismiss or withdraw and will proceed with the lawsuit.

To that end, we need to ensure that class records are preserved. Please advise as to whether your client has put a litigation hold on all outbound marketing related text messages. Please also advise as to whether you have placed Bandwidth on notice of the claims and so instructed it similarly to preserve evidence. If you are not so inclined to disclose in this regards, we will proceed with a motion to conduct early discovery, and will so inform the Court.

Regards, Matthew

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From: Gerri Robillard [<mailto:gerri.robillard@nelsonmullins.com>]
Sent: Friday, January 10, 2020 7:00 PM
To: anthony@paronichlaw.com; Matthew McCue <mmccue@massattorneys.net>; alex@cwlawgrouppc.com; ted@broderick-law.com
Cc: Kevin Polansky <kevin.polansky@nelsonmullins.com>
Subject: Mantha v. QuoteWizard.com, LLC, C.A. No. 1:19-cv-12235-LTS

Good Afternoon,

On behalf of Attorney Polansky, attached please find correspondence in connection with the above-subject matter. This has also been sent out by overnight mail.

Thank you,
Gerri



GERRI ROBILLARD SENIOR ADMINISTRATIVE ASSISTANT
gerri.robillard@nelsonmullins.com

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